

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

Melissa Baily (Bar No. 237649)

3 melissabaily@quinnemanuel.com

Lindsay Cooper (Bar No. 287125)

4 lindsaycooper@quinnemanuel.com

50 California Street, 22nd Floor

5 San Francisco, California 94111-4788

Telephone: (415) 875-6600

6 Facsimile: (415) 875-6700

7 *Attorneys for Google LLC*

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 GOOGLE LLC,

12 Plaintiff,

13 vs.

14 SONOS, INC.,

15 Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN
SUPPORT OF SONOS, INC.'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED (DKT. NO. 151)**

I, Jocelyn Ma, declare and state as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Sonos, Inc.’s (“Sonos”) Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”) (Dkt. No. 151) filed in connection with Sonos’s Motion for Leave to Amend Infringement Contentions (“Motion to Amend”) (Dkt. No. 150). If called as a witness, I could and would testify competently to the information contained herein.

3. Google seeks an order sealing the materials as listed below:

Document	Portions Sonos Sought to Be Filed Under Seal	Portions Google Seeks to Be Filed Under Seal	Designating Party
Exhibit 3 to the Declaration of Geoffrey Moss in Support of Sonos’s Motion to Amend (“Exhibit 3”)	Entire Document	Portions outlined in red boxes	Google
Exhibit 4 to the Declaration of Geoffrey Moss in Support of Sonos’s Motion to Amend (“Exhibit 4”)	Entire Document	Portions outlined in red boxes	Google

4. I understand that the Court analyzes sealing requests for motions for leave to amend infringement contentions pursuant to the “good cause” standard for non-dispositive motions. *See, e.g., Mediatek Inc. v. Freescale Semiconductor, Inc.*, No. 11-CV-5341 YGR, 2013 WL 10996547, at *1 (N.D. Cal. May 10, 2013).

5. The portions of Exhibit 3 and 4 outlined in red boxes contain references to Google’s confidential business information and trade secrets, including details regarding source code, architecture, and technical operation of Google’s products. The specifics of how these functionalities

1 operate is confidential information that Google does not share publicly. Thus, I understand that the
2 public disclosure of such information could lead to competitive harm to Google, as competitors could
3 use these details regarding the architecture and functionality of Google's products to gain a
4 competitive advantage in the marketplace with respect to their competing products. A less restrictive
5 alternative than sealing would not be sufficient because the information sought to be sealed is
6 Google's confidential business information and trade secrets but has been utilized by Sonos in support
7 of Sonos's Motion to Amend.

8 I declare under penalty of perjury under the laws of the United States of America that to the
9 best of my knowledge the foregoing is true and correct. Executed on March 8, 2022, in San
10 Francisco, California.

11 DATED: March 8, 2022

12 By: /s/ Jocelyn Ma
13 Jocelyn Ma
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28